

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Former Kaiser Smelter - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region X

**Subject:** POLREP #4  
Field Operations - Weeks 4 & 5  
Former Kaiser Smelter  
10RK00  
Mead, WA  
Latitude: 47.7525257 Longitude: -117.3777283

**To:** David Rees, EPA Region 10  
Stephen Ball, EPA Region 10  
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**From:** Brooks Stanfield, On Scene Coordinator

**Date:** 8/29/2020

**Reporting Period:** 8/16/20 - 8/29/20

1. Introduction

1.1 Background

<b>Site Number:</b>	10RK00	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	6/1/2020
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	7/27/2020	<b>Start Date:</b>	7/27/2020
<b>Demob Date:</b>	12/31/2020	<b>Completion Date:</b>	12/31/2020
<b>CERCLIS ID:</b>	WAN001020091	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	WA (Washington)
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

See PolRep #1 for Background

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

See POLREP #1 for background narrative.

2.1.2 Response Actions to Date

Removal Activities:

EPA maintained a consistent level of staffing on the Spokane Recycling LLC parcel through much of Weeks 4 and 5. Work continued to focus on removal of Robertson Siding from 13 of the estimated 22 buildings that were constructed with the material.

Operations undertaken by Kaiser Aluminum Investments Company (KAIC) to remove contaminated sediment from settling ponds and the supporting stormwater conveyance system began during this period. During the week of August 17th, a video investigation was conducted of the underground conveyance system. During the week of August 24th work activities focused on initiating the removal of contaminated sediment from the upper settling pond.

DECISION UNIT 1: ROBERTSON SIDING REMOVAL

EPA contractors have completed removal of Robertson Siding from Buildings 19G, 34, 36, 55, 55B, 57A (link to site diagram is provided under Section 7 of this PolRep). Buildings that have had siding partially removed include: 32A, 32F, 57, 58, 59, 59A, 60 and the Ore Bridge. Over 190,000 square feet out of an estimated 276,000 total square feet (69%) of Robertson Siding have been removed. Cleanup of contaminated debris in around storm drains along the south of Building 34 continued and is nearly completed. After contamination is cleared from the surface of the catchment basin directly impacted by the drip lines of buildings, a new filter sock is being installed to prevent residual contamination from entering the stormwater collection and conveyance system.

With the most easy-to-access siding removed, work crews have shifted to parts of the facility that pose more technical and safety challenges. EPA removal contractors consulted with an engineering firm to assess structures and develop plans to address areas such as the upper Ore Bridge, and sections of Buildings 32 and 32A that cannot be immediately reached with the 90-foot boom of the high reach grapple. Crews have also encountered several sources of friable asbestos (TSI and tanks covered in magnesia "mag" pipe insulation) that are directly impeding progress to safely remove Robertson Siding.

DECISION UNIT 2: TSI PIPE INSULATION REMOVAL

No activities to date.

### DECISION UNIT 3: WASTE PILE REMOVAL

START has completed an updated inventory of waste piles of green coke inside and in the vicinity of Building 52. Final estimated volumes will be calculated in the coming operational period.

### SETTLING PONDS & STORMWATER CONVEYANCE SYSTEM

KAIC and its contractors conducted a video investigation of the underground stormwater conveyance system between the Spokane Recycling parcel and the settling ponds and 660 feet down gradient from the lower settling pond. KAIC observed a small flow of water from the Spokane Recycling parcel that was observed to range between an estimated 2 and 15 gallons at various points during the week of August 24th. Overall, KAIC observed very little sediment accumulation within the portions of the conveyance system they were able to access with video cameras.

KAIC's contractors excavated a test pit on August 24th in the upper settling pond. The test pit showed a profile comprised of a sediment layer less than one foot thick, followed by a "felt" filtration fabric layer, followed with a layer of approximately three feet of 2" to 3" diameter drainage layer rock, finishing with a thick liner below the drainage layer. After receiving EPA approval of the selected hazardous waste landfill and securing a water source, KAIC's contractors began cleanup of contaminated sediment layer from the upper settling pond on Thursday 8/27. Because of the high propensity for generating fugitive dust from the excavation of very fine sediment, KAIC's crews spent much of 8/27 fine tuning their dust suppression approach. EPA and START observed portions of KAIC removal operations on 8/26, 8/27, and 8/28.

### Health & Safety

EPA's dust and asbestos fiber suppression activities continue to be very effective while removing Robertson Siding. A Negative Exposure Assessment of air sampling results was completed and it was determined air sampling activities could be scaled down until the crews encounter a change in work conditions. Perimeter air monitoring continues to ensure cleanup activities comply with Occupational Safety and Health Act (OSHA), the National Emission Standards for Hazardous Air Pollutants (NESHAP), and the Washington Administrative Code as it pertains to air pollution sources such as fugitive dust. Real-time data from air monitors is visible to EPA on personal computers or mobile devices from the command post or anywhere a network connection is available using the VIPER system.

KAIC's settling pond removal presents a unique set of safety challenges to this operation: (1) potential for mobilization and worker exposure from extremely fine and mobile contaminated dust emanating from dry pond sediment, and (2) vehicle traffic associated with workers at the adjacent sod farm whose access to their work location encroaches on KAIC's work zone. KAIC's team developed appropriate safety protocols for during their first day of field operations to address these challenges. EPA and START attended KAIC's safety meeting on 8/28.

EPA and KAIC work crews are strictly adhering to COVID-19 protocols at all times.

### Coordination Activities

-EPA and KAIC held a weekly planning meeting on 8/25 to discuss plans and progress with cleanup of settling ponds and stormwater conveyance system.

-EPA and Washington Department of Ecology (Ecology) held a monthly coordination conference call on 8/26.

-Going forward EPA, KAIC, and Ecology will hold weekly joint planning meetings.

### START Activities

-Set up 3-4 perimeter air monitoring stations daily to evaluate off-site impacts of the removal activities. Each station includes a DustTrak particulate monitor with data logging capability and air samples.

-Completed the Negative Exposure Assessment for removal of Robertson siding on 8/19/2020.

-Documented project progress by tracking project progress metrics, updating project dashboard, and using time lapse cameras to capture operations. Developed an updated draft Story Map for EPA's review.

-Used X-Ray Fluorescence (XRF) to confirm the presence of lead paint above action levels to assist ERRS in determining how to demolish and manage waste from the demolition of several small buildings.

-Collected samples of suspect Robertson Siding along the interior eastern wall of Building 57. Sample results confirmed the presence of PCBs, however asbestos was not present. ERRS was directed by the OSC to remove the PCB-laden siding.

-Completed an updated inventory of waste pile volumes within Green Mill Building, Building 53, and in the nearby outside area. Volume estimates will be finalized during the next operational period.

-Assisted EPA and ERRS by determining analytical needs for waste designation in preparation for proper disposal of this material.

-Collected samples of roofing material of Building 60 and submitted to analytical laboratory for bulk PLM (asbestos) analysis. If it is confirmed that asbestos is present in this material, it will limit EPA's ability to demolish this material in order to access and remove hard-to-reach vents constructed with Robertson Siding that run the length of the roof in Buildings 60, 58, and 55.

### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

No new enforcement activities to report during this period.

### **2.1.4 Progress Metrics**

<b>Waste Stream</b>	<b>Medium</b>	<b>Quantity</b>	<b>Manifest #</b>	<b>Treatment</b>	<b>Disposal</b>
PCBs & ACM	Robertson Siding	190,708 Sq Ft	N/A		338.34 tons
PCBs & PAHs	Pond Sediment	Forthcoming			Forthcoming

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## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### DECISION UNIT 1: ROBERTSON SIDING REMOVAL

During Weeks 6 and 7, the crew will continue the siding removal process. It is anticipated that Buildings 32, 32A, 58, 59, and 60. Crews will need to demolish buildings or portions of buildings that are blocking access to sections of Robertson Siding in high reach areas. The team will also need to begin abatement of limited sections of TSI and other friable asbestos sources that are blocking access to Robertson Siding. These abatement activities of incidental sections of TSI will be limited and not constitute initiation of Decision Unit 2.

The team will be meeting with engineering subcontractors to finalize removal plans for the Ore Bridge and other elevated building features.

#### DECISION UNIT 2: TSI PIPE INSULATION REMOVAL

START will begin developing an updated estimate of TSI quantities needing removal.

#### DECISION UNIT 3: WASTE PILE REMOVAL

START will complete calculation of updated estimate of waste pile volumes and sample piles to complete waste characterization.

#### SETTLING PONDS & STORMWATER CONVEYANCE SYSTEM

KAIC plans to continue removal of contaminated sediment from upper settling pond, which they expect to complete during the week of 8/31. Once complete, KAIC's team will transfer contaminated pond water from the lower pond to the upper pond where it will be stored awaiting treatment and enable the beginning of the removal of contaminated sediment from the lower pond.

EPA will continue with daily observations of settling pond removal activities.

#### Health & Safety

EPA and contractor crews have been working 60-hour weeks since 7/27. The crew will be initiating a three-day shutdown of operations over the three-day Labor Day weekend to give workers a chance to recuperate. KAIC will also shut down its operations cleaning up settling ponds over the holiday weekend.

#### Coordination Activities

EPA, KAIC, and Washington Department of Ecology will begin holding weekly joint planning meetings to coordinate forthcoming cleanup and stormwater system improvements.

#### START Activities

-Continue VIPER connections on monitoring equipment to provide remote viewing of real-time air monitoring readings of particulate matter.

-Continue development of GIS viewer and data dashboard to provide an up-to-date view of project progress. Development of material for Story Map, which will be made available to external audiences.

-Updated TSI inventory

-Sampling of waste piles for waste characterization.

### 2.2.2 Issues

EPA continues to coordinate with Spokane Recycling's on-site facility representative to discuss work activities and avoid safety issues around EPA's work zones.

Characterization of waste piles needs to be carefully planned in order to capture any potential heterogeneity of seemingly similar source material and to comply with Washington State Dangerous Waste regulations.

Several sources of friable TSI and "mag" asbestos are impeding the crew's ability to remove Robertson Siding. EPA and its contractors will be working on strategies to abate individual sources in order to safely complete siding removal activities.

## 2.3 Logistics Section

EPA's command post was connected to the power grid during this operational period. Additional lighting around the job trailers has been set up to assist overnight security.

Vehicle burglaries at the hotel, where many workers are staying, have been addressed with the hotel's hiring of additional night security.

## 2.4 Finance Section

### 2.4.1 Narrative

The OSC continues to work with EPA management finance staff to update financial needs and strategies for the completion of Decision Units 2 and 3.

\*ERRS costs reported include \$2,131,245.13 in pending costs.

#### **Estimated Costs \***

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$5,179,428.57	\$2,567,105.14	\$2,612,323.43	50.44%
START	\$648,514.35	\$182,313.00	\$466,201.35	71.89%

Intramural Costs				
<b>Total Site Costs</b>	\$5,827,942.92	\$2,749,418.14	\$3,078,524.78	52.82%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Valerie Cramer - START

### 2.5.2 Liaison Officer

### 2.5.3 Information Officer

Bill Dunbar - EPA Region 10

Ryan Lancaster - Washington Department of Ecology

### 2.5.4 Community Involvement Coordinator

Debra Sherbina - EPA Region 10

## 3. Participating Entities

### 3.1 Unified Command

N/A

### 3.2 Cooperating Agencies

Washington Department of Ecology

Spokane Regional Clean Air Agency

Spokane County Health District

## 4. Personnel On Site

### Spokane Recycling LLC Parcel

EPA - 2

START - 2

ERRS - 21

Spokane Recycling LLC - 1

### KAIC Parcel

KAIC - 2

Technical and Removal Contractors - 10

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

<https://www.kxly.com/epa-to-begin-removing-asbestos-pcbs-at-former-kaizer-aluminum-smelter-site/>

<https://www.spokesman.com/stories/2020/jul/28/epa-says-it-will-start-asbestos-pcb-cleanup-of-for/>

<https://m.facebook.com/eparegion10/>

### 6.2 Reporting Schedule

Reporting is expected to continue on a 14-day cycle for the foreseeable future.

Project updates are being made posted by EPA's PIO regularly to the Notices section of the project website: [https://response.epa.gov/site/bulletins\\_list.aspx?site\\_id=14546](https://response.epa.gov/site/bulletins_list.aspx?site_id=14546)

These updates are viewable by the general public.

## 7. Situational Reference Materials

[EPA Removal Project Site Diagram \(PDF\)](#)